

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
LOUISE ROGERS TATE,

Plaintiff

NANA GHOSH, MICHAEL COHEN, MOHD D.  
FARUGUE, ARISTISIDIS SHISMEROS,  
WAI KWOK HA, GOLAM MORTUJA,  
FRED WEINGARTEN, and HILTON HOTELS  
CORPORATION,

Defendants.  
-----X

Case No.: 07 CV 5885

**ANSWER TO CROSS-  
CLAIM OF KWOK WAI  
HA i/s/a WAI KWOK HA**

Judge Assigned:  
Judge Castel

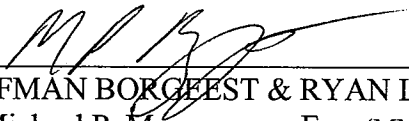
Defendant HILTON HOTELS CORPORATION hereinafter "HILTON", by its attorneys, KAUFMAN BORGEEST & RYAN LLP, as and for its Answer to the Cross-Claim of Defendant KWOK WAI HA i/s/a WAI KWOK HA hereinafter "HA", states upon information and belief as follows:

FIRST: In answering the paragraph labeled "AS AND FOR A CROSS-COMPLAINT AGAINST CO-DEFENDANTS" of the pleading constituting the Cross-Claim of Defendant HA, Defendant, HILTON denies the allegations as to Defendant HILTON and refers all issues of law to the Court and denies knowledge or information sufficient to form a belief as to the truth of the allegations as to co-defendants, NANA GHOSH, MICHAEL COHEN, MOHD D. FARUGUE, ARISTISIDIS SHISMEROS, GOLAM MORTUJA and FRED WEINGARTEN.

**WHEREFORE**, answering Defendant, HILTON, hereby demands judgment dismissing Defendant HA's Cross-Claim as against HILTON herein together with the costs, attorney's fees and such other and further relief as this Court may deem appropriate.

Dated: Valhalla, New York  
November 5, 2007

Respectfully submitted,

  
KAUFMAN BORGHEEST & RYAN LLP  
By: Michael P. Mezzacappa, Esq. (MM 0757)  
Attorneys for Defendant  
HILTON HOTELS CORPORATION  
200 Summit Lake Drive, First Floor  
Valhalla, New York 10595  
(914) 741-6100  
Our File No.: 747.004

TO: JON L. NORINSBERG, ESQ.  
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ARISTISIDIS SHISMEROS  
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Astoria, New York 11106-4838

**AFFIDAVIT OF SERVICE BY MAIL**

STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF WESTCHESTER        )

**NANCY BARBATO**, being duly sworn, deposes and says:

That deponent is not a party to this action, is over 18 years of age and resides in Westchester County, New York.

That on the 5th day of November, 2007, deponent served the within **ANSWER TO CROSS-CLAIM OF KWOK WAI HA i/s/a WAI KWOK HA** upon:

JON L. NORINSBERG, ESQ.  
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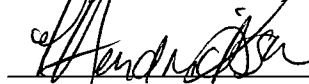
MICHAEL COHEN  
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Long Island City, New York 11101-5018

ARISTISIDIS SHISMEROS  
11-06 Broadway  
Astoria, New York 11106-4838

The attorneys for the respective parties in this action at the above addresses designated by said attorneys for that purpose by depositing a true copy thereof in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the U.S. Postal Service within the State of New York.

  
NANCY BARBATO

Sworn to before me this  
5th day of November, 2007.

  
\_\_\_\_\_  
Notary Public

TIFFANY S. HENDRICKSON  
Notary Public, State of New York  
No. 01HE6130070  
Qualified in Westchester County  
Commission Expires July 5, 2011